

**Commonwealth of Kentucky  
Division for Air Quality**

***RESPONSE TO COMMENTS***

ON THE CONDITIONAL MAJOR DRAFT PERMIT F-05-050

CYMETECH, LLC

2468 INDUSTRIAL PARKWAY

CALVERT CITY, KY 42029

JULY 18, 2006

RALPH GOSNEY, P.E., REVIEWER

SOURCE I.D.: 21-157-00061

SOURCE A.I. #: 46167

ACTIVITY #: APE20040001

**SOURCE DESCRIPTION:**

An application for an initial Conditional Major Operating Permit for Cymetech, LLC for the operation of a dicyclopentadiene (DCPD) monomer plant, located in Calvert City, Kentucky, was received by the Division on November 18, 2003.

**PUBLIC AND U.S. EPA REVIEW:**

On June 21, 2006, the public notice on availability of the draft permit and supporting material for comments by persons affected by the plant was published in *The Benton Marshal County Tribune* in Marshall County, Kentucky. The public comment period expired 30 days from the date of publication.

Comments were received from Paul Petitt, the Site Manager of Cymetech, LLC , on July 17, 2006. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed, except as stated herein. Please see Attachment A for a detailed explanation of the changes made to the permit.

# ATTACHMENT A

## Response to Comments

Comments on Cymetech, LLC's Draft Conditional Major Operating Permit submitted by Paul Petitt, Site Manager of Cymetech, LLC.

### Conditional Major Permit

1. **SECTION B – T01 Dicyclopentadiene Crackers, 4. Specific Monitoring Requirements; 5. Specific Recordkeeping Requirements** (p. 3 of 31) – The facility currently has a gas meter installed in the gas feed line that supplies both dicyclopentadiene crackers. It is requested that the Division add language to this section that allows the facility to continue to monitor the combined gas feed to the crackers to avoid the unnecessary cost of installing additional gas meters.

*Division's response: The Division concurs with the comment and has added the following language to the permit, "The facility may continue to use the gas meter in the gas feed line that supplies both dicyclopentadiene crackers to monitor the total gas usage of the two dicyclopentadiene crackers."*

2. **SECTION B – T01 Dicyclopentadiene Crackers, 4. Specific Monitoring Requirements, b; 5. Specific Recordkeeping Requirements** (p. 3 of 31) – The monitoring of hours of operation of the dicyclopentadiene crackers is not necessary because the permit application and draft permit are based on operation of these units continuously, 8,760 hours per year.

*Division's response: The Division concurs with the comment because the emission limit are in a pounds of pollutant per mmBtu basis and the number of hours of operation are not necessary for emission reporting. It is the Division's determination that this change is not a significant revision because it is not compliance monitoring.*

3. **SECTION B – T02 Dicyclopentadiene Process Units, 04 Description** (p. 4 of 31) – The facility would like to optionally recover liquid material from TK-316 by transferring it to the dicyclopentadiene product. This change would have no net emission increase. The following language is suggested to replace the current language in the description of this unit:

TK-316 received liquid discharge from the vacuum pump, which is then pumped to TK-312 "or recovered in the dicyclopentadiene product." TK-316 also vents to TK-312, which is connected to the Westlake CA&O Ethylene Plant Flare.

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.*

4. **SECTION B – T02 Dicyclopentadiene Process Units, 1. Operating Limitations, d.** (p. 6 of 31) – It appears that the following language of d. should be duplicated in the same subsection of SECTION H- ALTERNATE OPERATING SCENARIOS or moved to SECTION B, T03, 1. Operating Limitations.

d. The source is permitted to load or unload tank trucks and rail cars when the Westlake CA&O ethylene flare is not in operation. Emissions from loading or unloading of the tank trucks and rail cars shall be vented to a vapor recovery system when the flare is not in operation.

*Division's response: The Division has decided that the specified condition is most appropriate for Section B - T03 and is moved from **SECTION B – T02 Dicyclopentadiene Process Units, 1.d Operating Limitations** to **SECTION B – T03 Storage Tank Operations, 1.b Operating Limitations**.*

5. **SECTION B – T03 Storage Tank Operations, 6. Specific Reporting Requirements, a.** (p. 12 of 31) – This paragraph states in part, “The permittee shall submit a semiannual report...immediately.” The use of the words “semiannual” and “immediately” conflict with each other. Other statements, for this requirement in the draft permit, use only the word “immediately”.

*Division's response: The Division concurs with the comment and has removed the word “semiannual” from the permit condition.*

6. **SECTION C– INSIGNIFICANT ACTIVITIES (CONTINUED)** (p. 13 of 31) – The word “CONTINUED” should be removed from the first page of this section.

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the permittee.*

7. **SECTION C– INSIGNIFICANT ACTIVITIES, 6. 307L Trade DCPD Product Loading** (p. 13 of 31) – The facility would like to raise the maximum throughput to 5,350,000 gallons per year (from 4,599,000 gallons per year). This change produces only a negligible increase in emissions – not noticeable within the significant digits reported for total controlled emission in the permit application.

*Division's response: Controlled loading losses from this activity are currently 0.00247 tons per year (uncontrolled loading losses are 1.23 tons per year). This activity will continue to be classified as an insignificant activity even with an increase in maximum throughput from 4,599,000 gallons per year to 5,350,000 gallons per year. As such, the Division concurs with the comment and has revised the permit as suggested by the source.*

8. **SECTION C– INSIGNIFICANT ACTIVITIES, 7. 308L Dicyclopentadiene (DCPD) Product Loading** (p. 13 of 31) – Consistent with other product loading emission units, the following language should be added after maximum throughput:

(vents to either the Westlake flare or a vapor recovery system)

*Division's response: The Division concurs with the comment and has revised the permit as suggested by the source.*

**CREDIBLE EVIDENCE:**

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.